

EXHIBIT B

RFP No.	Documents X Corp. Has Agreed To Produce
6	Documents sufficient to show advertising, marketing, promotion, or statements of any kind encouraging Platform Users to upload music to the Platform.
7	Documents sufficient to identify its policies and procedures concerning copyright infringement by Platform Users.
8	Documents sufficient to reflect X's policies and practices, as well as related guidelines, training materials, and interpretations of policies, concerning copyright infringement by Platform Users.
9	Documents concerning its analysis of the adequacy of its copyright infringement policies.
10	Documents sufficient to show policies, practices, procedures, and processes, as well as related guidelines, training materials, and interpretations of policies, that X has adopted concerning DMCA Notices and DMCA Counter-Notices.
11	Documents sufficient to show policies, practices, procedures, and processes, as well as related guidelines, training materials, and interpretations of policies, that X has adopted concerning DMCA Notices and DMCA Counter-Notices.
12	Documents sufficient to identify requirements for a Platform User to become a Verified User.
13	Documents sufficient to show the changes made to the requirements for a Platform User to become a Verified User.
14	Documents reflecting the application of its Copyright Policies to Verified Users.
15	Documents sufficient to reflect and/or explain how X receives, processes and/or tracks "Infringement Notices." X will also produce summaries and analyses of how X's system for infringement notice tracking is working, including any reports on deficiencies.
16	Documents reflecting X's practices and procedures for identifying whether Platform Users identified in "Infringement Notices" or that have sent X a counter notification have more than one account.
17	Documents sufficient to reflect X's use of technology, tools, or devices to detect copyrighted music on the platform.
18	Documents sufficient to show X's practices for removing content subject to an "Infringement Notice" from multiple locations on the platform.
19	Documents sufficient to show actions taken by X in response to "Infringement Notices." X will also produce documents reflecting X's decisions about what actions to take (or not to take) in response to NMPA notices.
20	Documents sufficient to reflect the reactivation of services for any Platform User whose account was permanently suspended or terminated pursuant to X's DMCA policy. X will also produce ticket/case data reflecting suspensions, and custodial documents discussing those suspensions.

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21	Documents concerning its use of polls to determine whether to reinstate accounts that were suspended or terminated pursuant to X's policies and procedures concerning copyright infringement.
22	Documents sufficient to reflect the reactivation of services for any Platform User whose account was permanently suspended or terminated pursuant to X's DMCA policy. X will also produce documents reflecting policies and practices regarding any access that suspended users have to their accounts.
23	Documents sufficient to show circumstances where X does not remove or disable access to material identified as infringing in an "Infringement Notice."
24	Documents sufficient to reflect steps X has taken to block or limit the receipt of DMCA notices. X will also produce documents concerning any changes to notice processing procedures that have been implemented.
25	Documents sufficient to reflect X's policies concerning the removal and/or disabling of content identified in DMCA notices. X will also produce documents concerning steps to block or limit removal and/or disabling of DMCA content identified in "Infringement Notices," or suspensions of users.
26	Final versions of the "transparency" reports on Copyright Notices.
27	Documents sufficient to reflect relevant logged data concerning the processing of "Infringement Notices."
28	Documents sufficient to identify X's suspension data.
29	Documents sufficient to identify X's suspension data.
30	Documents sufficient to identify X's suspension data.
31	Documents sufficient to identify X's reactivation data.
32	Documents sufficient to show the team responsible for processing "Infringement Notices" and any associated budget for that team.
33	Documents sufficient to show the team responsible for processing "Infringement Notices" and any associated budget for that team.
35	Reports, presentations, and analyses about policies or practices about copyright infringement by Platform Users, and analyses on infringements and infringers themselves.
36	Reports, presentations, and analyses about policies or practices about copyright infringement by Platform Users, and analyses on infringements and infringers themselves.
37	Documents concerning the NMPA that pertain to "Infringement Notices" sent to X by NMPA.

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38	Documents sufficient to show information relating to NMPA notices. X will also produce internal communications about such notices.
41	Documents sufficient to reflect relevant logged data concerning the processing of “Infringement Notices.”
42	Communications with NMPA Noticed Users and records reflecting such communications.
43	Communications and documents, including notes, comments, and reports concerning relevant communications, with NMPA Noticed Users and records reflecting any such communications.
44	<p>Organizational charts or other documents sufficient to show X’s organizational structure, including the identity and title of each job occupant, for the following areas:</p> <ul style="list-style-type: none"> (i) developing, interpreting, or implementing X’s policies, procedures, practices, or strategies concerning copyright infringement by Platform Users, including X’s Copyright Policy or Repeat Infringer Policy; (ii) receiving, reviewing, processing, or taking action in response to Infringement Notices; (iii) tracking copyright infringement by Platform Users, including, without limitation, of any suspension, termination, or other adverse action of Platform users who repeatedly infringe; (iv) the Platform’s algorithms that govern what posts appear where, who sees which posts, how posts are selected for any given Platform User’s “For you” timeline, how posts are selected for inclusion under “Topics” for any given Platform User, how the “Trending” or “What’s happening” section of Platform is populated, and how the “Who to follow” section of the Platform is populated; (vi) maintenance, operation, and oversight of streaming activity on the Platform; and (vii) monitoring, reviewing, researching, surveying, or analyzing <ul style="list-style-type: none"> (a) Platform Users (b) Use of the Platform (c) content uploaded to the Platform (d) content streamed from the Platform (e) what attracts or retains Platform Users or increases use of the Platform (f) any of the activity in (i), (ii), or (iii) above (g) performance of the algorithms identified in (iv) above (h) content moderation (i) policing for violations of X’s Acceptable Use Policy or (j) analysis and oversight of X’s finances, including revenues streams

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45	Documents sufficient to identify the location of the Blobstore.
46	Documents sufficient to describe high level architecture of the Platform.
57	Documents sufficient to show X's revenue on a yearly, monthly, or quarterly basis.
59	Documents sufficient to describe the process by which Platform Users purchase advertising space on the Platform.
60	Documents sufficient to describe the process by which Platform Users purchase advertising space on the Platform.
61	Template agreements for Platform Users for advertising space.
62	Communications between X, on the one hand, and NMPA and/or Plaintiffs, on the other, that relate or refer to the NMPA Notices, as well as communications between X, on the one hand, and NMPA and/or Plaintiffs, on the other, about this lawsuit. X will also produce internal communications and communications with third parties related to this lawsuit.
63	Documents X intends to rely upon at summary judgment, hearings, and/or trial to support its affirmative defenses.
64	Documents produced to X by third parties in response to a subpoena.
65	Documents identified by Bates number in its responses to interrogatories or requests for admission.

ROG No.	X Corp. Has Agreed To Respond To Interrogatories Requesting The Following Information
3	Identify the persons, including current and former employees, with responsibility for or involvement in designing, developing, implementing, or overseeing X's current or former policies, procedures, or practices regarding Verified Users, including setting requirements to become a Verified User or affording any special treatment to Verified Users.
4	Identify the persons, including current and former employees, with responsibility for or involvement in designing, developing, or implementing X's current or former Copyright Policies, Repeat Infringer Policies, or any other policies, procedures, and practices for addressing actual or alleged copyright violations by Platform Users.
5	Identify the persons, including current and former employees, with responsibility for or involvement in designing, developing, or implementing X's current or former policies, procedures, or practices with respect to terminating, suspending, or taking any form of enforcement action regarding the accounts of Repeat Infringer Users.
6	Identify the persons, including current and former employees, with responsibility for or involvement in designing, developing, or implementing any system X used for handling Infringement Notices, including for receiving, processing, tracking, or taking steps in response to Infringement Notices, or with knowledge of the technical abilities of any such system.
7	Identify the persons, including current and former employees, with responsibility for or involvement in monitoring or handling Infringement Notices sent through https://help.twitter.com/en/forms/ipi/dmca/copyright-owner or with access to or included on the distribution list for copyright@twitter.com .
8	Describe in detail X's system(s), recordkeeping, and step-by-step policies, procedures, and practices, and any changes thereto over time, for receiving, processing, tracking, and taking action in response to Infringement Notices.
9	Describe in detail X's system(s), recordkeeping, and step-by-step policies, procedures, and practices, and any changes thereto over time, for terminating, or considering whether to terminate, the accounts of Repeat Infringer Users.
10	Where X terminates or suspends the account of a Repeat Infringer User, describe in detail X's step-by-step policies, procedures, and practices, and any changes thereto over time, with respect to permitting, supporting, or not precluding any continued or later access to or use of the account, including with respect to digital files stored on X's servers in connection with the account.
11	When X terminates, suspends, or takes any other form of enforcement action regarding an account of a Repeat Infringer User, describe in detail any steps X takes to (i) identify and take any action as to any other accounts held by that same Repeat Infringer User, and (ii) prevent that Repeat Infringer User from opening a new account.
12	Identify the persons, including current and former employees, responsible for or involved in the creation of X's "transparency" reports on Copyright Notices (e.g., https://transparency.twitter.com/en/reports/copyright-notices.html#2021-jul-dec).

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13	State by month and year the number of Infringement Notices X received, the number of Platform Users identified in or implicated by such Infringement Notices, and the number of those Platform Users who were Verified Users.
14	State by month and year the number of notices or communications X sent to Platform Users notifying such Platform Users of any claim contained in an Infringement Notice, the number of Platform Users who were sent such a notice or communication, and the number of those Platform Users who were Verified Users.
15	State by month and year the number of DMCA Counter-Notices X received from Platform Users, including the number of those Platform Users who were Verified Users.
16	State by month and year the number of Platform Users whose accounts X suspended or terminated in response to Infringement Notices or any policy or procedure relating to copyright infringement, broken down by the specific type of action You took, including whether it was temporary or permanent, and the number of those Platform Users who were Verified Users.
17	State by month and year the number of instances in which X “reactivated” an account of a Platform User that X had suspended or terminated in response to Infringement Notices or any policy or procedure relating to copyright infringement, broken down by whether the reactivation concerned a suspended or a terminated account, including whether it was intended to be temporary or permanent, and the number of those Platform Users who were Verified Users.
18	State by month and year the number of NMPA Noticed Users whose accounts X suspended or terminated in response to Infringement Notices or any policy or procedure relating to copyright infringement, broken down by the specific type of action X took, including whether it was temporary or permanent, and the number of those Platform Users who were Verified Users.
19	State the number of NMPA Noticed Users whose accounts X terminated or suspended for violation of any policy relating to copyright infringement but then later reactivated, broken down by type of action X took, including whether it was intended to be temporary or permanent, and identify the Platform User, the date of such termination or suspension, and the date of such later reactivation.
20	Identify the persons, including current and former employees, who have reviewed, monitored, taken any action against, or determined not to take any action against any of the NMPA Noticed Users.
21	Describe in detail any technologies, tools, devices, or capabilities X uses, currently or in the past, to identify Platform Users that have or use multiple accounts, including Platform Users identified in Infringement Notices.